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O 208.232.6101 2013 JUL 29 AM 8: 41

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Randall C. Budge rcb@racinelaw.net

July 25, 2013

Mrs. Jean Jewell, Secretary Idaho Public Utilities Commission P.O. Box 83720 Boise, Idaho 83720-0074

Re: Case No. PAC-E-13-05 (2013 IRP)

Dear Jean:

Enclosed for filing please find the original and seven copies of *Monsanto Company's Petition for Leave to Intervene.* Thank you for your assistance.

Sincerely,

RANDALL C. BUDGE

RCB:rr Enclosures

cc: Service List (via email)

Randall C. Budge, ISB No. 1949 Thomas J. Budge, ISB No. 7465 RACINE, OLSON, NYE, BUDGE & BAILEY, CHARTERED P.O. Box 1391; 201 E. Center

Pocatello, Idaho 83204-1391 Telephone: (208) 232-6101

Fax: (208) 232-6109 rcb@racinelaw.net

Attorneys for Intervenor Monsanto Company

2013 JUL 29 AM 8:41 UTILITIES COMMISSION

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF ROCKY MOUNTAIN)	
POWER'S INTEGRATED RESOURCE PLAN)	Case No. PAC-E-13-05
(IRP) FOR 2013)	
)	
)	
)	

PETITION OF MONSANTO COMPANY FOR LEAVE TO INTERVENE

COMES NOW Monsanto Company, herein called "this Intervenor" and pursuant to Rule 72 of the rules of Procedure of the Idaho Public Utility Commission, and by this Petition asks leave to intervene herein and to appear and participate as a party herein, and as basis therefor states as follows:

(1) The name and address of this Intervenor is:

Monsanto Company c/o Steven D. Spinner, Manager, Energy Procurement 800 N. Lindbergh Blvd., Mailzone C2NF St. Louis, Missouri 63167

This Intervenor will be represented by:

Randall C. Budge Racine, Olson, Nye, Budge & Bailey, Chartered P.O. Box 1391; 201 E. Center Pocatello, Idaho 83204-1391

and requests that copies of all pleadings and production requests and responses should be

PETITION OF MONSANTO COMPANY FOR LEAVE TO INTERVENE - 1

provided to the following:

Randall C. Budge Racine, Olson, Nye, Budge & Bailey, Chartered P.O. Box 1391; 201 E. Center Pocatello, Idaho 83204-1391 Telephone: (208) 232-6101

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Brubaker & Associates 16690 Swingley Ridge Rd., #140 Chesterfield, MO 63017

E-Mail: bcollins@consultbai.com

James R. Smith Monsanto Company P.O. Box 816 Soda Springs, Idaho 83276

Fax: 208-547-3312

E-Mail: jim.r.smith@monsanto.com

- (2) This Intervenor has a direct and substantial interest in this proceeding as a special contract customer of Applicant Rocky Mountain Power and intends to participate in all respects herein as a party as may be required to represent its interests.
- (3) Without the opportunity to intervene herein, this Intervenor would be without a manner or means of participating in the lawful determination of issues which will result in affecting its rates for electric service.

WHEREFORE, this Intervenor requests that this Commission confirm this Intervenor's leave to intervene in these proceedings and to appear and participate in all matters as may be necessary and appropriate; and to present evidence, call and examine witnesses, cross-examine witnesses, present argument, and to otherwise fully participate in the proceedings.

DATED this 25th day of July, 2013.

RACINE, OLSON, NYE, BUDGE & BAILEY, CHARTERED

y coo

LANDALL C. BUDGE

CERTIFICATE OF MAILING

I HEREBY CERTIFY that on this 25th day of July, 2013, I served a true, correct and complete copy of the foregoing document, to each of the following, via the method so indicated:

Jean D. Jewell, Secretary (original and 7) Idaho Public Utilities Commission P.O. Box 83720 Boise, ID 83720-0074

E-mail: jjewell@puc.state.id.us

U.S. Mail

Ted Weston Rocky Mountain Power 201 South Main, Suite 2300 Salt Lake City, Utah 84111

E-mail: ted.weston@pacificorp.com

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RANDALL C BUDGE